

May 01, 2023

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**BY: Julie Golden  
DEPUTY**LONESTAR AIRPORT HOLDINGS, LLC, §  
*Plaintiff,* §**

v. §

**CITY OF AUSTIN, TEXAS, §  
*Defendant.* §****CIVIL ACTION NO.  
1:22-CV-00770-RP****JOINT STIPULATION REGARDING  
DEFENDANT'S MOTION FOR PROTECTIVE ORDER**

Defendant the City of Austin, Texas (the "City") and Plaintiff LoneStar Airport Holdings, LLC ("LoneStar") enter into the following stipulation regarding the City's motion for protective order (Dkt. No. 88) filed on April 14, 2023:

Because the City requires additional time to confer with LoneStar regarding the motion for protective order, and for the sake of judicial efficiency, the City hereby withdraws its motion for protective order, without prejudice to refile within two weeks of LoneStar declaring an impasse in the meet and confer discussions. In the event the parties cannot resolve the issues in dispute, the parties agree that the City may refile its motion (as amended to reflect any agreements between the parties) and that LoneStar will not object to the refiled motion on the ground that it was filed after the deadline to do so. The parties further agree that LoneStar reserves and does not waive any other potentially applicable objection or defense to the refiled motion.

Signed this 1st day of May, 2023.



HON. ROBERT PITMAN  
United States District Judge

Stipulated and agreed:

/s/ Thomas J. Forestier

**WINSTEAD PC**

Thomas J. Forestier  
State Bar No. 07256560  
[tforestier@winstead.com](mailto:tforestier@winstead.com)  
Christopher Robertson  
State Bar No. 24107267  
[crobertson@winstead.com](mailto:crobertson@winstead.com)  
600 Travis Street, Suite 5200  
Houston, Texas 77002  
Telephone: (713) 650-2749  
Facsimile: (713) 650-2400

Stephen R. Clarke  
State Bar No. 24069517  
[sclarke@winstead.com](mailto:sclarke@winstead.com)  
500 Winstead Building  
2728 N. Harwood Street  
Dallas, Texas 75201  
Telephone: (214) 745-5400  
Facsimile: (214) 745-5390

**CITY OF AUSTIN LAW DEPARTMENT**

Anne L. Morgan, City Attorney  
Meghan L. Riley, Chief, Litigation  
State Bar No. 24049373  
[meghan.riley@ausintexas.gov](mailto:meghan.riley@ausintexas.gov)  
P.O. Box 1546  
Austin, TX 78767-1088  
Telephone: (512) 974-2458  
Facsimile: (512) 974-1311

**DOYLE & SEELBACH PLLC**

Andrew J. Schumacher  
State Bar No. 24051310  
[andrew@doyleseelbach.com](mailto:andrew@doyleseelbach.com)  
13215 Bee Cave Parkway, Suite A220  
Austin, Texas 78738  
Telephone: (737) 270-9951  
Facsimile: (512) 960-4893

**ATTORNEYS FOR DEFENDANT  
THE CITY OF AUSTIN**

-and-

/s/ Bethany Kristovich

**KING & SPALDING, LLP**

Edward F. Fernandes (SBN 06932700)

Julia C. Barrett (SBN 24116075)

500 W 2nd St #1800

Austin, Texas 78701

T: 512 457 2000

efernandes@kslaw.com

jbarrett@kslaw.com

Lawrence A. Slovensky (*pro hac vice*)

Mandi Goodman (*pro hac vice*)

1180 Peachtree St NE

Atlanta, Georgia 30309

T: 404 572 4600

lslovensky@kslaw.com

**MUNGER, TOLLES & OLSEN LLP**

Bethany Kristovich (*pro hac vice*)

Michael Doyen (*pro hac vice*)

John Major (*pro hac vice*)

350 South Grand Avenue

Los Angeles, California 90071

T: 213 683 9292

Michael.doyen@mto.com

Bethany.kristovich@mto.com

John.major@mto.com

**BARRON, ADLER, CLOUGH & ODDO, LLP**

Christopher M. Clough (SBN 24044802)

Christopher J. Oddo (SBN 24013257)

808 Nueces Street

Austin, Texas 78701

T: 512 478 4995

clough@barronadler.com

oddo@barronadler.com

**ATTORNEYS FOR PLAINTIFF**

**LONESTAR AIRPORT HOLDINGS, LLC**